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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

E.P., K.R., C.R., D.C., A.L., and B.G.,  
individually and on behalf of all others  
similarly situated,

Plaintiffs,

v.

PROVIDENCE ST. JOSEPH HEALTH;  
PROVIDENCE HEALTH & SERVICES;  
PROVIDENCE HEALTH & SERVICES –  
OREGON; PROVIDENCE WILLAMETTE  
FALLS MEDICAL CENTER; PROVIDENCE  
PORTLAND MEDICAL CENTER; OREGON  
ANESTHESIOLOGY GROUP; LEGACY  
HEALTH; and LEGACY MOUNT HOOD  
MEDICAL CENTER,

Defendants.

Case No. 3:24-cv-01215-JR

**JOINT STIPULATED MOTION TO  
VACATE DEADLINE TO ANSWER  
FIRST AMENDED CLASS ACTION  
COMPLAINT AND TO PROPOSE  
BRIEFING SCHEDULE**

**LR 7-1 CERTIFICATE OF CONFERRAL**

Pursuant to LR 7-1(a), counsel for defendants Providence St. Joseph Health, Providence Health & Services, Providence Health & Services – Oregon, Providence Willamette Falls Medical Center, Providence Portland Medical Center, Legacy Health, Legacy Mount Hood Medical Center, and Oregon Anesthesiology Group (“Defendants”) certify that they conferred with counsel for plaintiffs E.P., K.R., C.R., D.C., A.L., and B.G. (“Plaintiffs”, and together with Defendants, the “Parties”) before filing this Motion. This is a Joint Stipulated Motion.

**MOTION**

Pursuant to Fed. R. Civ. P. 6(b) and LR 16-3, the Parties jointly stipulate and move to vacate the current October 31, 2024, date for Defendants to respond to the First Amended Class Action Complaint (“FAC”) (ECF No. 7). Defendants intend to move to dismiss the FAC. Therefore, the Parties further jointly stipulate and propose to the Court to submit a full briefing schedule for those motions, the responses thereto, and the replies in support of the motions no later than November 6. In support of this Motion, the Parties state as follows:

1. Plaintiffs filed the original Complaint on July 26, 2024. (ECF No. 1.) Plaintiffs then filed the FAC on July 31, 2024.
2. Defendants had previously filed initial unopposed motions for an extension of time to respond to the FAC (ECF Nos. 14, 17, 19), which were granted (ECF Nos. 15, 21). Defendants filed an additional unopposed motion for an extension of time to respond to the FAC (ECF No. 24), which was granted (ECF No. 25). All Defendants currently have a date of October 31, 2024, to respond to the FAC.

3. The Parties now seek for the Court to vacate the October 31, 2024, date for Defendants' response to the FAC and propose to submit a complete proposed briefing schedule to the Court no later than November 6, 2024.

4. There is good cause for the further extension. Defendants continue to investigate the nature of the allegations and claims as they prepare their motions to dismiss the FAC.<sup>1</sup> This Motion is not made for purposes of delay.

DATED: October 29, 2024

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<sup>1</sup> The Defendants reserve any right, defense, affirmative defense, claim, or objection in this matter.

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Pursuant to L.R. 11-1(b), I hereby attest that the above signatories, on whose behalf this filing is jointly submitted, concur in this filing’s contents and have authorized the filing of this document.

DATED: October 29, 2024

*s/ Elizabeth H. White*  
Elizabeth H. White

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served on October 29, 2024, with a copy of the foregoing document via the Court's CM/ECF system.

DATED: October 29, 2024

By: s/ Elizabeth H. White  
Elizabeth H. White